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GOOGLE LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

## SAN FRANCISCO DIVISION

20 ANIBAL RODRIGUEZ, et al. individually and  
on behalf of all others similarly situated,

Case No. 3:20-CV-04688-RS

**DECLARATION OF CHELSEA HU IN  
SUPPORT OF GOOGLE LLC'S OPPOSITION  
TO PLAINTIFFS' MOTION IN LIMINE NO. 10  
TO PRECLUDE GOOGLE FROM CALLING  
REBUTTAL EXPERT DONNA L. HOFFMAN**

Dept: 3, 17<sup>th</sup> Fl.  
Judge: Hon. Richard Seeborg

Date Action Filed: July 14, 2020  
Trial Date: August 18, 2025

1 I, Chelsea Hu, hereby declare as follows:

2       1. I am an associate with the law firm Cooley LLP and am counsel for Defendant  
 3 Google LLC in the above captioned action. I am duly licensed to practice law in the state of  
 4 California and am admitted to practice before this Court. The matters set forth herein are of my  
 5 own personal knowledge, and if called as a witness to testify, I could and would testify to these  
 6 matters. I submit this declaration in support of Google's Opposition to Plaintiffs' Motion *in Limine*  
 7 No. 10 filed concurrently herewith.

8       2. Attached hereto as **Exhibit A** is a true and correct copy of excerpts of the final  
 9 transcripts available through August 24, 2025.

10      3. Attached hereto as **Exhibit B** is a true and correct copy of excerpts of the rough trial  
 11 transcript from August 25, 2025.

12      4. At 4:17 PM on Monday, August 25, Plaintiffs' counsel emailed counsel for Google  
 13 to inform them that they are "unlikely to call Bruce Schneier" despite both sides' awareness that  
 14 Google would start putting on witnesses on Tuesday.

15       I declare under penalty of perjury under the laws of the State of California and the United  
 16 States of America that the forgoing is true and correct.

17       Executed on August 26, 2025 at San Francisco, California.

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*/s/ Chelsea Hu*

Chelsea Hu

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